



July 13, 2007  
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Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

**Response to a Request for Additional Information Regarding ANP-10268P "U.S. EPR Severe Accident Evaluation Topical Report" (TAC No. MD3803)**

Ref. 1: Letter, Ronnie L. Gardner (AREVA NP Inc.) to Document Control Desk (NRC), "Request for Review and Approval of ANP-10268P Revision 0, 'U.S. EPR Severe Accident Evaluation Topical Report'," NRC:06:049, October 31, 2006.

Ref. 2: Letter, Getachew Tesfaye (NRC) to Ronnie L. Gardner (AREVA NP Inc.), "Request for Additional Information Regarding ANP-10268P, 'U.S. EPR Severe Accident Evaluation Topical Report' (TAC No. MD3803)," June 13, 2007.

Ref. 3: Letter, Getachew Tesfaye (NRC) to Ronnie L. Gardner (AREVA NP Inc.), "Acceptance for Review of U.S. EPR Severe Accident Evaluation Topical Report (TAC No. MD3803)," January 17, 2007.

AREVA NP Inc. (AREVA NP) requested the NRC's review and approval of the topical report ANP-10268P Revision 0 in Reference 1. The NRC provided a Request for Additional Information (RAI) regarding this topical report in Reference 2. The response to this RAI is enclosed with this letter, ANP-10268Q1P, "Response to Request for Additional Information ANP-10268P, U.S. EPR Severe Accident Evaluation Topical Report."

AREVA NP considers some of the material contained in the enclosed document to be proprietary. As required by 10 CFR 2.390(b), an affidavit is enclosed to support the withholding of the information from public disclosure. Proprietary and non-proprietary versions of the document are provided on the enclosed CDs.

In Reference 2, NRC stated that the staff expects to issue any additional RAI by July 31, 2007. Updates to the topical report that are discussed in several RAI responses will be provided concurrent with the responses to the anticipated RAI. However, AREVA NP believes that the information provided in ANP-10268Q1P is sufficient to respond completely to and resolve the staff's questions in Reference 2.

AREVA NP plans to reference the topical report ANP-10268P in its Design Control Document (DCD) for the U.S. EPR. Reference 2 and 3 state that the NRC plans to complete its review of the topical report and issue the draft safety evaluation by September 30, 2007. AREVA NP understands that this timely response to the RAI supports the scheduled deliverable of the draft safety evaluation.

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If you have any questions related to this submittal, please contact Ms. Sandra M. Sloan, Regulatory Affairs Manager for New Plants Deployment. She may be reached by telephone at 434-832-2369 or by e-mail at [sandra.sloan@areva.com](mailto:sandra.sloan@areva.com).

Sincerely,



Ronnie L. Gardner, Manager  
Site Operations and Regulatory Affairs  
AREVA NP Inc.

Enclosures

cc: L. Burkhart  
G. Tesfaye  
Project 733

A F F I D A V I T

STATE OF VIRGINIA        )  
                                  ) ss.  
COUNTY OF BENTON        )

1. My name is Ronda M. Daflucas. I am Deputy Licensing Manager, Regulatory Affairs for New Plants Deployment, for AREVA NP Inc. and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by AREVA NP to determine whether certain AREVA NP information is proprietary. I am familiar with the policies established by AREVA NP to ensure the proper application of these criteria.

3. I am familiar with the AREVA NP information contained in ANP-10268Q1P, "Response to Request for Additional Information ANP-10268P, U.S. EPR Severe Accident Evaluation Topical Report," and referred to herein as "Document." Information contained in this Document has been classified by AREVA NP as proprietary in accordance with the policies established by AREVA NP for the control and protection of proprietary and confidential information.

4. This Document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by AREVA NP and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in this Document as proprietary and confidential.

5. This Document has been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in this Document be withheld from public disclosure. The request for withholding of proprietary information is made in

accordance with 10 CFR 2.390. The information for which withholding from disclosure is requested qualifies under 10 CFR 2.390(a)(4) "Trade secrets and commercial or financial information".

6. The following criteria are customarily applied by AREVA NP to determine whether information should be classified as proprietary:

- (a) The information reveals details of AREVA NP's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for AREVA NP.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for AREVA NP in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by AREVA NP, would be helpful to competitors to AREVA NP, and would likely cause substantial harm to the competitive position of AREVA NP.

The information in the Document is considered proprietary for the reasons set forth in paragraphs 6(b) and 6(c) above.

7. In accordance with AREVA NP's policies governing the protection and control of information, proprietary information contained in this Document has been made available, on a limited basis, to others outside AREVA NP only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. AREVA NP policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

Jonathan Dager

SUBSCRIBED before me this 12<sup>th</sup>  
day of July, 2007.

Kathleen A. Bennett

Kathleen A. Bennett  
NOTARY PUBLIC, STATE OF VIRGINIA  
MY COMMISSION EXPIRES: 8/31/2011

